

May 29, 2003

Mr. Jack Broadbent  
Director of Air Management Division  
**United States Environmental Protection Agency**  
75 Hawthorne Street  
San Francisco, CA 94105

Re: **Shore Terminals – Facility # A7034**  
Minor Revision

**ALAMEDA COUNTY**

Roberta Cooper  
Scott Haggerty  
(Chairperson)  
Nate Miley  
Shelia Young

**CONTRA COSTA  
COUNTY**

Mark DeSaulnier  
Mark Ross  
Gayle Uilkema  
(Secretary)

**MARIN COUNTY**

Harold C. Brown, Jr.

**NAPA COUNTY**

Brad Wagenknecht

**SAN FRANCISCO  
COUNTY**

Willie Brown, Jr.  
Chris Daly  
Jake McGoldrick

**SAN MATEO COUNTY**

Jerry Hill  
Marland Townsend  
(Vice-Chairperson)

**SANTA CLARA COUNTY**

Liz Kniss  
Julia Miller  
Dena Mossar  
(Vacant)

**SOLANO COUNTY**

John F. Silva

**SONOMA COUNTY**

Tim Smith  
Pamela Torliatt

William C. Norton  
**EXECUTIVE  
OFFICER/APCO**

Dear Mr. Broadbent:

This is to advise you that the Bay Area Air Quality Management District is proposing a Minor Revision to the Major Facility Review Permit for Shore Terminals (Facility Number A7034).

The purpose of the revision is to add two existing diesel emergency generators that lost their exemptions pursuant to the revision of Regulation 2, Rule 1, General Requirements, dated 5/17/00, and three new gasoline internal floating roof tanks with 4.2 million gallons capacity each. These revisions were reviewed under District Applications #4684 and #5850, respectively. To add these sources, the following sections were revised or added:

- Table IIA - Permitted Sources
- Table IV-J, and Table IV-K – Source Specific Applicable Requirements
- Section VI - Schedule A of Condition # 1253 revised to change the total POC emissions for the whole facility from 65.1 to 67.146 tons per calendar year.
- Section VI - Condition # 19308 added for S-75 and S-76, Emergency Diesel Generators
- Section VI - Condition # 20060 added for S-77, S-78 and S-78, Internal Floating Roof Tanks
- Table VII-J, and Table VII-K - Applicable Limits and Compliance Monitoring Requirements
- Table VIII Test Methods (addition of the sulfur fuel test method, and particulate visible test method)

The following corrections and changes were also made:

- The standard portions of the permit have been updated.
- The dates of various BAAQMD and SIP rules have been updated or corrected.
- Various corrections of grammar and permit format were made.
- The bases for some conditions cited in Section IV, Source-Specific Applicable Requirements, were corrected to reflect the correct bases in Section VI, Permit Conditions.
- Tables IV-A, B, C, D, H, and Tables VII-A, B, C, D, H were corrected to reflect the 11/27/02 amendments to Regulation 8-5, Storage of Organic Liquids.

- Table IV-L and Table VII-L were added to include the facility's specific applicable requirements and applicable limits and compliance monitoring.
- Condition #9005 was deleted because sources in the condition were never built and the authority to construct was canceled.
- Condition #1253, part IIB was added to require that all fixed roof tanks, truck rack and marine loading be abated by A-1, thermal oxidizer.
- Abatement devices A-41 and A-2 were removed from the list of Table IIB because they were no longer in service.
- The capacity and fuel usage of thermal oxidizer were added to Table IIB.
- NOx and SOx emissions from vapor control equipment combustion and direct fire heater combustion were included in the total limit listed in Condition #1253, part IIID, Schedule B and C.
- Facility-wide recordkeeping was moved from the source-specific tables in Section IV and VII to new "Facility" tables.

Please note that pursuant to Regulation 2-6-406, you may proceed with the revision as soon as you receive this letter if you comply with the proposed permit terms and conditions. The permit will be finalized after EPA's 45-day review period.

Copies of the proposed Major Facility Review Permit and the permit evaluations are enclosed for your information. If you have any questions on this matter, please call Steve Hill, Permit Evaluation Manager, at (415) 749-4673.

Very truly yours,

William C. Norton  
Executive Officer/Air Pollution Control

Officer

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Enclosures

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